

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
Eastern Division**

In Re)	Chapter 7
CHRISTEL R. GLASER,)	Case No. 14-10747
Debtor)	
<hr/>		
JOHN J. AQUINO, CHAPTER 7 TRUSTEE OF CHRISTEL R. GLASER,)	Adv. Proceeding No.: 16-1028
Plaintiff)	
v.)	
NATIONSTAR MORTGAGE LLC,)	
Defendant)	
<hr/>		

**JOINT MOTION FOR ENTRY OF ORDER MODIFYING
JOINT PROPOSED DISCOVERY PLAN**

To the Honorable Melvin S. Hoffman, Chief U.S. Bankruptcy Judge:

John J. Aquino, the plaintiff herein and duly appointed trustee of the Chapter 7 estate of Christel R. Glaser (the “Trustee”), and Nationstar Mortgage LLC (“Nationstar”), the defendant in the within adversary proceeding, jointly request that the Court enter an order approving a further brief extension of discovery and related pretrial deadlines in the within adversary proceeding. In support of such request, the parties respectfully represent as follows:

1. The Trustee initiated the within adversary proceeding on February 22, 2016 by the filing of his complaint against Nationstar.

2. Nationstar filed its answer and counterclaim on March 24, 2016, and the Trustee filed his answer to Nationstar's counterclaim on April 14, 2016.

3. At the present time, dispositive motions are to be filed by April 17, 2017, and a joint pretrial memorandum is to be filed by May 1, 2017.

4. As the Court has been advised previously, the parties have engaged in discussions regarding potential resolution of the issues in this adversary proceeding. The parties believe they have reached an agreement in principle regarding settlement of this matter. As such, Trustee's counsel participated in a conference call with the Debtor and her counsel to explain the terms of the anticipated settlement. Thereafter, however, the Debtor retained new counsel who requested an additional conference call with the Trustee to explain the terms of the agreement in principle. That conference call took place on December 22, 2016. Since that time, the parties have prepared draft settlement documents which have been reviewed and are presently being revised for final consideration by the parties and submission to the Court. In light of the foregoing, the parties wish to extend the pretrial deadlines for an additional short period to allow for completion of consideration of the presently pending proposal. The parties therefore request a modification of the aforesaid deadlines as follows:

Completion of discovery: May 30, 2017
Dispositive motions filed by: June 16, 2017
Joint Pre-Trial Memorandum: July 1, 2017

WHEREFORE, the parties respectfully pray that the Court:

1. Enter an order extending the pretrial deadlines as set forth herein; and
2. Grant such other and further relief as may be just and proper.

JOHN J. AQUINO,
CHAPTER 7 TRUSTEE,

By his counsel,

/s/ Donald F. Farrell, Jr.
Donald F. Farrell, Jr. (BBO 159580)
ANDERSON AQUINO LLP
240 Lewis Wharf
Boston, MA 02110
(617) 723-3600
dff@andersonaquino.com

NATIONSTAR MORTGAGE LLC

By its counsel,

/s/ Mark B. Johnson (with permission)
Mark B. Johnson (BBO 252760)
Kathleen M. Heyer (BBO 685380)
JOHNSON & BORENSTEIN, LLC
12 Chestnut Street
Andover, MA 01810
(978) 475-4488
mark@jblclaw.com
kathleen.heyer@jblclaw.com

Dated: April 17, 2017.